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*Of Attorneys for Defendant City of Portland*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

MEGHAN OPBROEK, an individual,

Case No.: 3:22-cv-00610-JR

PLAINTIFF,

v.

CITY OF PORTLAND, a municipal corporation,  
ZACHARY DOMKA in his individual capacity,  
BRENT TAYLOR, in his individual capacity,  
MARK DUARTE, in his individual capacity, and  
ERIK KAMMERER in his individual capacity,

DEFENDANTS.

SUPPLEMENTAL DECLARATION OF  
WILLIAM W. MANLOVE IN SUPPORT  
OF DEFENDANT CITY OF  
PORTLAND'S PARTIAL MOTION TO  
DISMISS

I, William W. Manlove, declare as follows:

1. I am a Senior Deputy City Attorney currently assigned to this action. I represent Defendant City of Portland ("City") in the above-entitled matter.
2. Attached to this declaration as ***Exhibit 4*** is a true and correct copy of the Listing of Legislative Records relating to House Bill 1515.
3. Attached to this declaration as ***Exhibit 5*** is a true and correct copy of excerpts of House Bill 1515.

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4. Attached to this declaration as ***Exhibit 6*** is a true and correct copy of excerpts of the March 10, 1969, HB House Judiciary Committee Meeting Minutes.

5. Attached to this declaration as ***Exhibit 7*** is a true and correct copy of the Explanation of House Bill 1515 and Comments on House Bill 1515 by Section, prepared by Joseph T. Henke.

6. Attached to this declaration as ***Exhibit 8*** is a true and correct copy of excerpts of March 14, 1969, HB 1515 House Judiciary Committee Meeting Minutes.

7. Attached to this declaration as ***Exhibit 9*** is a true and correct copy of the April 10, 1969 Proposed Amendments to House Bill 1515.

8. Attached to this declaration as ***Exhibit 10*** is a true and correct copy of the May 8, 1969 House Amendments to House Bill 1515 by Committee on Judiciary.

9. Attached to this declaration as ***Exhibit 11*** is a true and correct copy of May 1, 1969 correspondence to Joseph T. Henke regarding proposed amendments to House Bill 1515.

10. Attached to this declaration as ***Exhibit 12*** is a true and correct copy of excerpts of May 14, 1969, HB 1515 Senate Judiciary Committee Meeting Minutes.

11. Attached to this declaration as ***Exhibit 13*** is a true and correct copy of Chapter 38, Of the suppression of riots, from the Criminal Code of Oregon, enacted on October 19, 1864.

12. I make this declaration in support of Defendant City's Partial Motion to Dismiss.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: March 21, 2023.

/s/ William W. Manlove  
William W. Manlove